

FILED

FEB - 5 2019

CLERK, U.S. DISTRICT COURT  
By [Signature]  
DeputyIN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

JORDAN ROTENBERRY  
KRISTY JACKSON  
SAMANTHA SWINDELL

SEALED

NO.

FILED UNDER SEAL**3-19CR-058-S**INDICTMENTCount OneConspiracy to Commit Access Device Fraud  
(Violation of 18 U.S.C. § 371)

## THE GRAND JURY CHARGES:

At times material to this Indictment:

1. From in or around August of 2018, through on or about January 28, 2019, in the Northern District of Texas, Dallas Division, and elsewhere, defendants **Jordan Rotenberry, Kristy Jackson, and Samantha Swindell**, did unlawfully, knowingly, and willfully combine, conspire, confederate, and agree with each other and other persons, known and unknown to the Grand Jury, to (1) knowingly and with intent to defraud possess fifteen or more devices which are counterfeit and unauthorized access devices, affecting interstate or foreign commerce, in violation of Title 18, United States Code, Section 1029(a)(3); and (2) knowingly and with the intent to defraud, produce, traffic in, have control and custody of, and possess device-making equipment, affecting interstate

or foreign commerce, in violation of Title 18, United States Code, Section 1029(a)(4).

Manner and Means

2. It was part of the conspiracy that the conspirators used and caused others to use an embosser to make the unauthorized access devices.
3. It was further part of the conspiracy that the conspirators obtained the unauthorized access devices from chat rooms, the dark web, and through other means.
4. It was further part of the conspiracy that the conspirators shared the unauthorized access devices in exchange for drugs and money, among other things.
5. It was further part of the conspiracy that the conspirators used the counterfeit and unauthorized access devices to make fraudulent charges at hotels and other locations.

Overt Acts

6. In order to effect the purpose and object of the conspiracy, defendants **Jordan Rotenberry, Kristy Jackson, and Samantha Swindell**, and others, known and unknown to the Grand Jury, caused the following overt acts in the Northern District of Texas and elsewhere:

- a. From in or around August of 2018, through on or about January 28, 2019, defendants **Jordan Rotenberry, Kristy Jackson, and Samantha Swindell** used, and caused others to use an embosser machine to make unauthorized and counterfeit access devices.
- b. On or about December 22, 2018, defendant **Jordan Rotenberry**, Individual

1, and Individual 2, travelled to a big box retail store to obtain gift cards to be embossed with unauthorized access devices.

c. From in or around August of 2018, through on or about January 28, 2019, defendants **Jordan Rotenberry, Kristy Jackson, and Samantha Swindell**, and others, known and unknown to the Grand Jury, used and caused others to use the stolen and unauthorized access devices to make fraudulent charges at hotels and other locations affecting interstate commerce.

d. From in or around August of 2018, through on or about January 28, 2019, defendants **Jordan Rotenberry, Kristy Jackson, and Samantha Swindell**, shared the stolen and unauthorized access devices with one another, and others, known and unknown to the Grand Jury.

e. From in or around August of 2018, through on or about January 28, 2019, defendants **Jordan Rotenberry, Kristy Jackson, Samantha Swindell**, and others, known and unknown to the Grand Jury, used the proceeds from the credit card scheme to buy drugs.

In violation of 18 United States Code § 371.

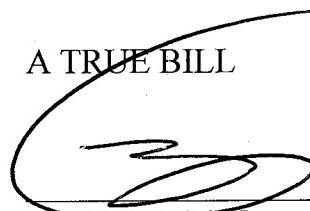
Count Two  
Access Device Fraud  
(Violation of 18 U.S.C. § 1029(a)(3))

THE GRAND JURY FURTHER CHARGES:

7. The allegations contained in paragraphs two through six of this Indictment are re-alleged and incorporated by reference.
8. Beginning on or about August 30, 2018, and continuing until on or about January 28, 2019, in the Northern District of Texas, defendant **Samantha Swindell**, did knowingly and with the intent to defraud possess fifteen (15) or more unauthorized access devices, namely, credit and debit card account numbers which were stolen and obtained with intent to defraud.

In violation of 18 United States Code § 1029(a)(3).

A TRUE BILL

  
\_\_\_\_\_  
FOREPERSON

ERIN NEALY COX  
UNITED STATES ATTORNEY

  
\_\_\_\_\_  
RYAN R. RAYBOULD  
Assistant United States Attorney  
Kansas Bar No. 25429  
1100 Commerce Street, Third Floor  
Dallas, Texas 75242-1699  
Tel: 214.659.8713

  
\_\_\_\_\_  
DAMIEN M. DIGGS  
Assistant United States Attorney  
D.C. Bar No. 501-552  
1100 Commerce Street, 3rd Floor  
Dallas, Texas 75242-1699  
Tel: 214.659.8629

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

---

THE UNITED STATES OF AMERICA

v.

JORDAN ROTENBERRY  
KRISTY JACKSON  
SAMANTHA SWINDELL

---

SEALED INDICTMENT

18 U.S.C. § 371  
Conspiracy to Commit Access Device Fraud  
(Count 1)

18 U.S.C. § 1029(a)(3)  
Access Device Fraud  
(Counts 2)

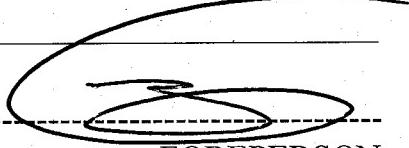
2 Counts

---

A true bill rendered

---

DALLAS

  
FOREPERSON

Filed in open court this 5 day of February, 2019.

---

**Warrant to be Issued – Jordan Rotenberry and Kristy Jackson  
Samantha Swindell in Federal Custody since 1/28/2019, Kaufman County Jail.**

---

  
UNITED STATES MAGISTRATE JUDGE  
Magistrate Court Number: 3:19-MJ-19-BN